

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE	*	BKRTCY. NO. 14-08190 ESL
EVELIO DROZ RAMOS	*	CHAPTER 13
AUREA ESTHER FRANCO DE DIAZ	*	
DEBTORS		

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NOTICE OF FILING OF AMENDED CHAPTER 13 PLAN  
AND CERTIFICATE OF SERVICE

TO THE HONORABLE COURT:

COME NOW, **EVELIO DROZ RAMOS and AUREA ESTHER FRANCO DE DIAZ**, debtors in the above captioned case, through the undersigned attorney and very respectfully state and pray as follows:

1. The debtors are hereby submitting an amended Chapter 13 Plan, dated July 18, 2016, herewith and attached to this motion.

2. The Chapter 13 Plan is amended to provide for POC #12-1 filed by PR Asset Portfolio 2013-1 International LLC ("PRAPI"), stating that since debtors filed an adversary proceeding to determine the validity of PRAPI's mortgage lien, the debtors' treatment of PRAPI's claim hinges on the outcome of said adversary proceeding, in the above captioned case.

I CERTIFY, that on this same date a copy of this Notice was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee, and all CM/ECF participants; I also certify that a copy of this notice was sent via US Regular Mail to PR Asset Portfolio 2013-1 International LLC, 270 Muñoz Rivera Avenue Suite 302 San Juan PR 00918; Briseida Y Delgado Miranda, Esq. Counsel for PR Asset Portfolio, PMB 112 130 Winston Churchill Suite 1 San Juan PR 00926; and via regular mail to the debtors and to all creditors and parties in interest appearing on the master address list, hereby attached.

NOTICE

The debtors' proposed amended Plan dated July 18, 2016, copy of which is attached to this motion, contains provisions that may affect your claim(s) as a named creditor in the above captioned case.

Therefore, you are notified that within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has

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Notice of Amended Chapter 13 Plan  
Case no. 14-08190 ESL13

been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 20<sup>th</sup> day of July, 2016.

*/s/Roberto Figueroa Carrasquillo*  
USDC #203614  
**RFIGUEROA CARRASQUILLO LAW OFFICE PSC**  
ATTORNEY FOR PETITIONERS/DEBTORS  
PO BOX 186 CAGUAS PR 00726  
TEL NO 787-744-7699 FAX 787-746-5294  
Email: [rfigueroa@rfclawpr.com](mailto:rfigueroa@rfclawpr.com)

United States Bankruptcy Court  
District of Puerto Rico

IN RE:

Case No. **3:14-bk-8190**


**DROZ RAMOS, EVELIO & FRANCO DE DIAZ, AUREA ESTHER**

Chapter **13**

Debtor(s)

**AMENDED CHAPTER 13 PAYMENT PLAN**

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☒ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: <input type="checkbox"/> PRE <input type="checkbox"/> POST-CONFIRMATION		<input checked="" type="checkbox"/> AMENDED PLAN DATED: <b>7/18/2016</b> Filed by: <input checked="" type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input type="checkbox"/> Other																															
<b>I. PAYMENT PLAN SCHEDULE</b>  <table style="width:100%;"> <tr> <td style="width:15%;">\$</td> <td style="width:25%;">300.00</td> <td style="width:10%;">x</td> <td style="width:10%;">3</td> <td style="width:10%;">= \$</td> <td style="width:30%;">900.00</td> </tr> <tr> <td>\$</td> <td>445.00</td> <td>x</td> <td>33</td> <td>= \$</td> <td>14,685.00</td> </tr> <tr> <td>\$</td> <td></td> <td>x</td> <td></td> <td>= \$</td> <td></td> </tr> <tr> <td>\$</td> <td></td> <td>x</td> <td></td> <td>= \$</td> <td></td> </tr> <tr> <td>\$</td> <td></td> <td>x</td> <td></td> <td>= \$</td> <td></td> </tr> </table> <p style="text-align: right;">TOTAL: \$ <b>15,585.00</b></p> <p>Additional Payments:                  \$ <b>70,000.00</b> to be paid as a LUMP SUM                  within <b>36 months</b> with proceeds to come from:</p> <p><input type="checkbox"/> Sale of Property identified as follows:</p> <p><input checked="" type="checkbox"/> Other:  <b>Liquidation of hereditary interest in real property                  Barranquitas PR (36 mos.)</b></p> <p>Periodic Payments to be made other than, and in                  addition to the above:                  \$ _____ x _____ = \$ _____</p> <p style="text-align: right;">PROPOSED BASE: \$ <b>85,585.00</b></p>		\$	300.00	x	3	= \$	900.00	\$	445.00	x	33	= \$	14,685.00	\$		x		= \$		\$		x		= \$		\$		x		= \$		<b>II. DISBURSEMENT SCHEDULE</b>  A. ADEQUATE PROTECTION PAYMENTS OR _____ \$ B. SECURED CLAIMS: <input type="checkbox"/> Debtor represents no secured claims. <input checked="" type="checkbox"/> Creditors having secured claims will retain their liens and shall be paid as follows: 1. <input checked="" type="checkbox"/> Trustee pays secured ARREARS: Cr. <b>Santander PR</b> Cr. _____ Cr. _____ # <b>Claim 3-1</b> # _____ # _____ \$ <b>5,871.74</b> \$ _____ \$ _____ 2. <input checked="" type="checkbox"/> Trustee pays IN FULL Secured Claims: Cr. <b>Department of Treas</b> Cr. _____ Cr. _____ # <b>xxx-xx-9253</b> # _____ # _____ \$ <b>1,831.49</b> \$ _____ \$ _____ 3. <input type="checkbox"/> Trustee pays VALUE OF COLLATERAL: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 4. <input type="checkbox"/> Debtor SURRENDERS COLLATERAL to Lien Holder:  5. <input type="checkbox"/> Other:  6. <input checked="" type="checkbox"/> Debtor otherwise maintains regular payments directly to: <b>Santander PR</b> C. PRIORITIES: The Trustee shall pay priorities in accordance with the law. 11 U.S.C. § 507 and § 1322(a)(2) D. UNSECURED CLAIMS: Plan <input type="checkbox"/> Classifies <input checked="" type="checkbox"/> Does not Classify Claims. 1. (a) Class A: <input type="checkbox"/> Co-debtor Claims / <input type="checkbox"/> Other: <input type="checkbox"/> Paid 100% / <input type="checkbox"/> Other: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 2. Unsecured Claims otherwise receive PRO-RATA disbursements.  OTHER PROVISIONS: (Executory contracts, payment of interest to unsecureds, etc.) * Debtors will pay all duly filed unsecured claims in full (100% + 4.25% interest per annum), through the Chapter 13 Plan. * Claim #4-1 filed by Jose Israel Droz Alvarado to be paid directly upon liquidation of hereditary interest (25%) in real property located at Barranquitas, PR. * "Tax refunds will be devoted each year, as periodic payments, to the plan's funding until plan completion. The plan shall be deemed modified by such amount, without the need of further Court order. The debtor(s) shall seek court's authorization prior any use of funds." * PR Asset Portfolio 2013-1 International LLC ("PRAPI") POC #12-1 debtors filed an Adversary Proceeding pursuant to Rule 7001(b) requesting the Court to determine the validity of PRAPI's lien. PRAPI's treatment as a creditor in the present case hinges on the outcome of the aforesaid adversary proceeding.	
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\$	445.00	x	33	= \$	14,685.00																												
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<b>III. ATTORNEY'S FEES</b> (Treated as § 507 Priorities)  Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: \$ <b>1,993.00</b>																																	
Signed:  Debtor  _____ Joint Debtor																																	

Attorney for Debtor **R. Figueroa Carrasquillo Law Office**

Phone: **(787) 744-7699**

Label Matrix for local noticing  
0104-3  
Case 14-08190-ESL13  
District of Puerto Rico  
Old San Juan  
Wed Jul 20 12:00:39 AST 2016

PR ASSET PORTFOLIO 2013-1 INTERNATIONAL, LLC  
270 Munoz Rivera, Suite 201  
Hato Rey, PR 00918-1905

Amex  
Po Box 297871  
Fort Lauderdale, FL 33329-7871

Banco Santander de PR as servicing Agent Of  
Martinez & Torres Law Offices, P.S.C  
PO.Box 192938  
San Juan, PR 00919-3409

Claro  
Po Box 360998  
San Juan, PR 00936-0998

Discover Fin Svcs Llc  
Po Box 15316  
Wilmington, DE 19850-5316

JOSE ISRAEL DROZ ALVARADO  
151 CESAR GONZALEZ ST  
PLAZA ANTILLA APT 3403  
SAN JUAN PR 00918

PR ASSET PORTFOLIO 2013-1 INT I LLC  
C/O MENDIN & ZAPATA  
60 JOSE MARTI STREET  
SAN JUAN, PR 00917-3104

Santander PR  
PO Box 71504  
San Kuan, PR 00936-8604

Synchrony Bank Fka Ge Capital  
4150 Friedrich Lane Suit  
Austin, TX 78744-1800

American Express Centurion Bank  
c/o Becket and Lee LLP  
POB 3001  
Malvern, PA 19355-0701

US Bankruptcy Court District of P.R.  
Jose V Toledo Fed Bldg & US Courthouse  
300 Recinto Sur Street, Room 109  
San Juan, PR 00901-1964

Banco Popular de PR as servicing agent of Fa  
PO. Box 192938  
San Juan PR 00919-3409

(p)BANK OF AMERICA  
PO BOX 982238  
EL PASO TX 79998-2238

Department Stores National Bank For Macys Br  
Bankruptcy Processing  
Po Box 8053  
Mason, OH 45040-8053

Hsbc Bank Nevada N.a. Office  
Po Box 10497  
Greenville, SC 29603-0497

LVNV Funding, LLC its successors and assigns  
assignee of HSBC Private Label  
Acquisition Corporation (USA)  
Resurgent Capital Services  
PO Box 10587  
Greenville, SC 29603-0587

PR ASSET PORTFOLIO 2013-1, INTERNATIONAL, LL  
270 MUNOZ RIVERA AVE SUITE 201  
SAN JUAN, PR 00918-1905

Second Round Lp  
4150 Freidrich Ln  
Austin, TX 78744-1052

AUREA ESTHER FRANCO DE DIAZ  
PO BOX 3652  
BAYAMON GARDENS STA  
BAYAMON, PR 00958-0652

Banco Santander de PR as servicing agent of  
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PO Box 192938  
San Juan, PR 00919-3409

Department of Treasury  
Bankruptcy Section (424)  
P.O. Box 9024140  
San Juan PR 00902-4140

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Martinez & Torres Law Offices, P.S.C  
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San Juan , PR 00919-3409

Cavalry SPV I, LLC  
500 Summit Lake Drive, Ste 400  
Valhalla, NY 10595-1340

Discover Bank  
DB Servicing Corporation  
PO Box 3025  
New Albany, OH 43054-3025

Israel Droz Alvarado  
Cond Plaza Antillana Apt 3403  
San Juan, PR 00918

Lvnv Funding Llc  
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SAN JUAN, PR 00902-3884

MONSITA LECAROS ARRIAS  
OFFICE OF THE US TRUSTEE (UST)  
OCHOA BUILDING  
500 TANCA STREET SUITE 301  
SAN JUAN, PR 00901

ROBERTO FIGUEROA CARRASQUILLO  
PO BOX 186  
CAGUAS, PR 00726-0186

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Bk Of Amer  
Po Box 982235  
El Paso, TX 79998

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)American Express Centurion Bank  
c/o Becket and Lee LLP  
POB 3001  
Malvern PA 19355-0701

End of Label Matrix	
Mailable recipients	32
Bypassed recipients	1
Total	33